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**From:** Rukavina, Davor  
**Sent:** Thursday, February 23, 2023 1:07 PM CST  
**To:** Silverstein, Paul  
**CC:** Eric Schaffer; Guffy, Philip  
**Subject:** RE: Goodman/Prosperity

Gentlemen:

Real quick, we had our meeting with Prosperity's lawyer yesterday at Jackson Walker. I delivered our ultimatum and informed them that, if we don't have a deal next week, we will be filing suit (as co-plaintiffs) by next Friday. Jackson Walker assured us that this was on the top of the bank's priority list and that they understood the importance and urgency of it. They asked us to send certain discovery responses and documents, which we have. I pointed out that I do not see a principled defense, and they had no answer. They mumbled some defense to the Bond Trustee's claim to the effect that they did not wrong *after* the UCC notice was sent, but did not have a defense to the violation of the DACA or the subordination agreement. I will let you know as soon as we hear something and, if not, I do intend to file suit next week and would welcome doing so together.

Please respond to the Trustee's agreed 506(c) offer.

Thank you

Davor Rukavina, Esq.

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**From:** Silverstein, Paul <[PaulSilverstein@andrewskurth.com](mailto:PaulSilverstein@andrewskurth.com)>  
**Sent:** Wednesday, February 22, 2023 12:43 PM  
**To:** Rukavina, Davor <[drukavina@munsch.com](mailto:drukavina@munsch.com)>  
**Cc:** Eric Schaffer <[eschaffer@stonecipherlaw.com](mailto:eschaffer@stonecipherlaw.com)>; Guffy, Philip <[PGuffy@hunton.com](mailto:PGuffy@hunton.com)>  
**Subject:** Re: Goodman/Prosperity

Thanks for quick response. Not understanding your message below. Report on your call/discussion with Prosperity? Weren't you going to be speaking with Prosperity yesterday?  
Thanks again.

Paul N. Silverstein  
[\(212\) 850-2819](tel:(212)850-2819) (office)  
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[PSilverstein@HuntonAK.com](mailto:PSilverstein@HuntonAK.com)

On Feb 22, 2023, at 1:39 PM, Rukavina, Davor <[drukavina@munsch.com](mailto:drukavina@munsch.com)> wrote:

Caution: This email originated from outside of the firm.

I will inquire again.

Davor Rukavina, Esq.

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**From:** "Silverstein, Paul" <[PaulSilverstein@andrewskurth.com](mailto:PaulSilverstein@andrewskurth.com)>  
**Date:** Wed, Feb 22, 2023, 12:36  
**To:** "Rukavina, Davor" <[drukavina@munsch.com](mailto:drukavina@munsch.com)>  
**CC:** Eric Schaffer <[eschaffer@stonecipherlaw.com](mailto:eschaffer@stonecipherlaw.com)>, "Guffy, Philip" <[PGuffy@hunton.com](mailto:PGuffy@hunton.com)>  
**Subject:** Re: Goodman/Prosperity

**External Email: Use caution with links and attachments.**

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Davor:

We'd like a report on your call/discussion with Prosperity that you indicated you were having.

(Unless there's a quick and easy resolution with Prosperity, I think you're making a mistake not having John Goodman demand that Prosperity release the funds, as I requested. Parham agreed that John would do just that months ago.)

Thank you.

Paul N. Silverstein  
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